

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

In re:
KENNETH J. SAMANSKY
Debtor(s)

§
§
§

Case No. 13-41306

CHAPTER 13

**CREDITOR'S UNOPPOSED RESPONSE TO DEBTOR'S MOTION TO SELL REAL
ESTATE FREE AND CLEAR OF LIENS PURSUANT TO 11 USC §363(f)**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Comes now, BANK OF AMERICA, N.A. (hereinafter "Respondent") its successors and/or assigns, a secured creditor and party in interest in the captioned proceedings, and files the following objection to the Motion (hereinafter "Motion") to Sell Secured Property:

1. Respondent admits to the content contained in paragraphs 1-5 of the Debtors' Motion.
 - a. Respondent notes that the Motion does not state the buyer is a good faith purchaser.
2. Respondent is without sufficient knowledge to admit or deny the estimated closing costs are the usual and customary closing costs; therefore, makes a qualified denial of the content contained in paragraph 6.
3. Respondent admits to the content contained in paragraph 7-8.
 - a. Respondent requests that the order state Bank of America will be paid in full satisfaction of its lien.

Date: June 20, 2014

/s/ Maria M. Bartlett

Name: Maria M. Bartlett

State Bar No.: 24087147

Address: Parkway Office Center, Suite 900

14160 North Dallas Parkway

Dallas, TX 75254

Telephone: (214) 635-2650

Fax: (214) 635-2686

E-mail: mbartlett@mwzmlaw.com

ATTORNEY FOR BANK OF AMERICA, N.A.

Certificate of Service

A copy of this statement was served on the persons listed below, in the manner listed below on June 20, 2014.

/s/ Maria M. Bartlett
Maria M. Bartlett

Via Pre-Paid U.S. Mail:
KENNETH J. SAMANSKY
P.O. BOX 1551
DENTON, TX 76202
Debtor(s)

Via ECF:
ROBERT E. BARRON
P.O. BOX 1347
NEDERLAND, TX 77627
Attorney for Debtor(s)

Via ECF:
JANNA L. COUNTRYMAN
P. O. BOX 941166
PLANO, TX 75094-1166
13 Trustee

Via ECF:
US TRUSTEE
OFFICE OF THE U.S. TRUSTEE
110 N. COLLEGE AVE.
SUITE 300
TYLER, TX 75702

Via ECF:
DENTON COUNTY
P.O. BOX 90223
DENTON, TEXAS 76202-5223